

Engineering Site-Specific Lead Compliance Plan

This Site Specific Lead Compliance Plan has been developed to comply with OSHA Construction Industry Lead Standard 29 CFR 1926.62. This site-specific plan is used with the BNSF (BNSF) Lead Program, which describes general requirements where work is performed resulting in potential employee exposure to lead. The site-specific plan is reviewed every six months provided that an engineering project extends beyond that time. The BNSF designated competent person assigned to this project has the complete authority to implement this plan which covers all employees in the facility potentially impacting lead containing materials.

- 1) BNSF Engineering Project Location: _____
- 2) Competent Person for this location: _____
- 3) This project is a (circle one): Large-scale project Small-scale project. (See Number 8 below)
- 4) Description of activities that occur in BNSF Engineering projects that could emit lead:

Welding Torch cutting Heating Grinding

Air arcing Plasma arcing Needle gun scaling Other (Fill in) _____

- 5) Crafts represented in the BNSF Engineering Department Projects:

Bridge and Building Welders Laborers 1st Class Carpenters 2nd Class Carpenters

Bridge and Building Foremen Truck Drivers Blacksmiths Mechanics

Bridge and Building Assistant Foremen Other (fill in) _____

- 6) Engineering controls used in BNSF Engineering projects to reduce or eliminate lead exposures:

The BNSF Engineering Department does not use engineering controls to a great extent due to the results of many feasibility studies conducted on various state-of-the-art control designs. For the majority of the projects, personal protective equipment will be required to protect the occupational health of employees. Engineering controls that are used on a limited basis include but are not limited to the following:

Vacuum enhanced shrouded tools such as grinders, needle gun scalers, etc.

Vacuums equipped with High Efficiency Particulate Air (HEPA) filters

Wet methods for dust suppression and reduction during clean up

- 7) Personal Protective Equipment. PPE has two main functions relative to this lead project. First, respiratory protection is used to protect employees from breathing airborne lead particles. Second, clothing items such as gloves, coveralls, hoods, etc., keep lead particles off of employees and their street clothing.
- 8) Decontamination Procedures. BNSF Engineering projects fall into two categories relative to the use of decontamination trailers: Large and Small scale hot work activities. Large-scale hot work merits the use of decontamination trailers due to the amount of hot work that will be performed. For these projects, a fully functioning decontamination trailer will be brought on site to provide employees a hygienic means to keep themselves and their belongings free from lead contamination. For smaller scale projects, employees are allowed to wear a coverall over their street clothing. They are not required to completely remove their street clothing prior to donning protective clothing unless they want to. Their decontamination procedure consists of removing protective outer clothing such as a disposable suit, and washing their hands and face. If a vacuum equipped with a HEPA filter is available for use, then the employees are encouraged to use the vacuum to remove visible debris from their clothing. As an added measure of protection from lead contamination, BNSF recommends that the employees shower as soon as they can after their workday has ended.
- 9) Respirator Use. Respirators are to be issued in accordance with the BNSF Respiratory Protection Program. This program includes instructions to fill out a medical questionnaire, provide employee training on the use and limitations of respirator

use, respirator selection and proper fit-testing. Please refer to the BNSF Respiratory Protection Program that is posted on the BNSF Intranet website under *Safety/Medical and Environmental Health/Respiratory Protection*.

- 10) Personal hygiene equipment and supplies. The Competent Person is responsible for conducting routine inspections of hand washing stations, showers, towelette dispensers, soap dispensers, etc. to ensure that these items are in good working order for employee hygiene. Additionally, the Competent Person will ensure that consumable personal protective equipment such as disposable suits, gloves and respirators are sufficiently stocked for employee use.
- 11) Air monitoring efforts: The BNSF Engineering department has designated the Competent Person responsible for requesting that welding fume samples be collected for a particular project. Air monitoring results will be shared with the employees involved in activities that could emit lead.